

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RYAN PERRY, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CABLE NEWS NETWORK, INC., a
Delaware corporation, and CNN
INTERACTIVE GROUP, INC., a Delaware
corporation,

Defendants.

Case No. 1:14-cv-01194

Hon. Robert W. Gettleman

Magistrate Judge Sheila M. Finnegan

**STIPULATED MOTION TO EXTEND BRIEFING SCHEDULE ON MOTION
TO TRANSFER AND FOR LEAVE TO FILE AMENDED COMPLAINT**

Plaintiff Ryan Perry (“Plaintiff”) and Defendants Cable News Network, Inc. and CNN Interactive Group, Inc. (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court enter an Order (i) extending the briefing schedule on Defendants’ pending motion to transfer by seven (7) days, and (ii) granting Plaintiff leave to file a first amended class action complaint. In support of the instant stipulation, the Parties state as follows:

WHEREAS, Plaintiff filed his complaint commencing this action on February 18, 2014 (Dkt. 1);

WHEREAS, Defendants filed their Motion to Transfer or in the Alternative Dismiss on April 25, 2014 (Dkt. 18);

WHEREAS, on May 1, 2014, the Court entered a Minute Order granting Plaintiff leave to take discovery limited to the issues raised in Defendants’ Motion to Transfer and further, requiring Plaintiff to respond to Defendants’ Motion to Transfer no later than June 23, 2014

(Dkt. 22);

WHEREAS, per the Court's May 1st Order, Plaintiff served his written discovery requests on the issues raised in the Motion to Transfer, Defendants provided written responses to those requests on June 13, 2014, and Plaintiff received documents in response to those requests on June 16, 2014;

WHEREAS, Plaintiff represents that he requires a seven (7) day extension of his deadline to oppose Defendants' Motion to Transfer in order to adequately review Defendants' discovery responses and document production, and to prepare his opposition to the Motion, such that his opposition would be due no later than June 30, 2014;

WHEREAS, in light of the foregoing, the Parties have conferred and agreed, subject to the Court's approval, that Plaintiff may have through and including June 30, 2014 to file his opposition to Defendants' Motion to Transfer, and Defendants shall have through and including July 21, 2014 to reply in support of the same;

WHEREAS, based on further investigation undertaken since the filing of his original complaint, Plaintiff additionally seeks to file a first amended class action complaint;

WHEREAS, the Parties have conferred and agreed that, pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiff shall file his first amended complaint no later than June 30, 2014;

WHEREAS, the Parties further agree based on Plaintiff's representation regarding the nature of the amendment, that the filing of a first amended complaint should not further alter their briefing or the Court's ruling on Defendants' Motion to Transfer;

WHEREAS, the Parties have also conferred and agreed, subject to the Court's approval, that Defendants' deadline to answer or otherwise respond to Plaintiff's first amended complaint shall be the date twenty-one (21) days following the Court's ruling on the Motion to Transfer to

the extent that the matter is not transferred;

WHEREAS, the Parties have also conferred and agreed that, to the extent the Court grants Defendants' Motion to Transfer and transfers this matter to the United States District Court for the Northern District of Georgia, the deadline for Defendants to answer or otherwise respond to Plaintiff's first amended complaint set forth in this stipulation shall be set aside, and all deadlines regarding answering or otherwise responding to Plaintiff's first amended complaint shall be set by the United States District Court for the Northern District of Georgia, and no Party shall be deemed to be in default of any deadline until such new deadlines have been affirmatively set.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, and upon the Court's approval, that:

1. Plaintiff shall file his opposition to Defendants' Motion to Transfer no later than June 30, 2014;
2. Plaintiff shall file his first amended class action complaint no later than June 30, 2014;
3. Defendants shall file their reply in support of their Motion to Transfer no later than July 21, 2014; and
4. Defendants shall file their answer or otherwise respond to Plaintiff's first amended complaint no later than the date twenty-one (21) days after the Court's ruling on Defendants' Motion to Transfer to the extent that the matter is not transferred.

IT IS SO STIPULATED.

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RYAN PERRY, individually and on behalf of all others similarly situated,

Dated: June 20, 2014

By: s/ J. Dominick Larry
One of Plaintiff's Attorneys

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**CABLE NEWS NETWORK, INC., and CNN
INTERACTIVE GROUP, INC.,**

Dated: June 20, 2014

By: s/ Robert F. Huff, Jr.
One of Defendants' Attorneys

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SIGNATURE ATTESTATION

Pursuant to Section IX(C)(2) of the General Order on Electronic Case Filing, I hereby attest that the content of this document is acceptable to all person whose signatures are indicated by a conformed signature (s/) within this e-filed document.

s/ J. Dominick Larry

CERTIFICATE OF SERVICE

I, J. Dominick Larry, an attorney, certify that on June 20, 2014, I served the above and foregoing ***Stipulated Motion to Extend Briefing Schedule on Motion to Transfer and for Leave to File Amended Complaint***, by causing true and accurate copies of such paper to be transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

s/ J. Dominick Larry